

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

I, Joel P. Schroeder, being duly sworn, state as follows:

1. I am one of the attorneys representing Defendant Royal Norwegian Embassy (the “Embassy”) in this action. This affidavit is true and correct to the best of my knowledge, information and belief.

2. In this litigation, the Embassy produced 16,981 documents, or 89,001 pages of documents. Of the 16,889 dated documents produced by the Embassy, approximately 7,381 documents—or 43.7%—are dated on or before January 31, 2010.

3. Attached as Exhibit A to this affidavit is a true and correct copy of an email from Gary Gandrud to Ambassador Wegger Strømmen, dated January 5, 2010, in which Mr. Gandrud states: "Definitely do not feel that [Ewald] is headed towards or even thinking about litigation."

This concludes my affidavit which consists of two typewritten pages and the attached Exhibit A.

s/ Joel P. Schroeder
Joel P. Schroeder

Subscribed and sworn to before me
this 5th day of November, 2013

s/ Nancy Meehan
Notary Public
My Commission Expires January 31, 2015.

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